

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALL FUNDS ON DEPOSIT IN ARZI
BANK, ZURICH, SWITZERLAND,
ACCOUNT NO. 220707, AND ALL
FUNDS TRACEABLE THERETO; AND
ALL FUNDS ON DEPOSIT IN HONG
KONG SHANGHAI BANKING
CORPORATION (HSBC) REPUBLIC
BANK, GENEVA, SWITZERLAND,
ACCOUNT NO. 43555TN, FORMERLY
HSBC ACCOUNT NO. 31241, AND
ALL FUNDS TRACEABLE THERETO,

Defendants.

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* CIVIL ACTION NO.
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* 1:08-CV-1899-RWS
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NOTICE OF FILING COMPLAINT FOR FORFEITURE

**TO: HSBC Republic Bank
Geneva Switzerland RUE Alfred Vincent 2 1211
Geneva C.P. 2019
Switzerland**

A civil complaint seeking forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) and 21 U.S.C. § 881(a)(6) was filed on May 30, 2008, in the United States District Court for the Northern District of Georgia by Michael J. Brown, Assistant United States Attorney, on behalf of the United States of America, Plaintiff, against all funds on deposit in Arzi Bank, Zurich, Switzerland, Account No. 220707, and all funds traceable thereto, and any and all funds maintained at Hong Kong Shanghai Banking Corporation (HSBC)

Republic Bank, Geneva, Switzerland, Account No. 43555TN, formerly HSBC Account No. 31241, and all funds traceable thereto.

To avoid forfeiture of the property, any person claiming an interest in the Defendant Accounts must file a verified Claim in the manner set forth in Rule G(5) of the Supplemental Rules for Certain Admiralty and Maritime Claims not later than 35 days after the receipt of this notice. See Rule G(5)(a)(ii). In addition, any person having filed such a Claim shall also file an Answer to the Complaint, or a motion under Rule 12 of the Federal Rules of Civil Procedure, not later than 20 days after the filing of the Claim. See Rule G(5)(b).

Supplemental Rule G(5)(a) provides in pertinent part:

(i) a person who asserts an interest in the defendant property may contest the forfeiture by filing a claim in the court where the action is pending. The Claim must: (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property; (C) be signed by the claimant under penalty of perjury; and (D) be served on the government attorney.

Supplemental Rule G(5)(b) provides in pertinent part: "[a] claimant must serve and file an answer to the complaint or a motion under Rule 12 within 20 days after filing the claim."

The Claim and Answer shall be filed with the Office of the Clerk of Court, United States District Court for the Northern District of Georgia, 75 Spring Street, S.W., Suite 2211, Atlanta, Georgia USA 30303, with copies of each served upon Assistant U.S. Attorney Michael J. Brown, 75 Spring Street, S.W., Suite 600,

Atlanta, Georgia USA 30303.

Pursuant to Rule G(4)(b) of the Supplemental Rules for Certain Admiralty and Maritime Claims, Plaintiff sent this Notice to the above-listed entity, who reasonably appeared to be a potential claimant to the Defendant Accounts on the facts known to the Plaintiff. Therefore, a verified claim must be received and filed **within 35 days after the receipt of this Notice.**

This 27th day of June, 2008.

Respectfully submitted,

DAVID E. NAHMIAS
UNITED STATES ATTORNEY

/s/ Michael J. Brown
MICHAEL JOHN BROWN
ASSISTANT UNITED STATES ATTORNEY
Georgia Bar No.: 064437

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